REMARKS

Claims 1-70 are currently pending in the application; with claims 1, 11, 30, 43, 59, and 65 being independent. Claim 11 has been amended to more appropriately define the present invention. Applicants respectfully request favorable consideration in light of the amendments and remarks presented herein, and earnestly seek timely allowance of the pending claims.

Improprieties Noted in Outstanding Office Action

Applicants note that the Examiner improperly failed to consider claims 69 and 70 which were presented in the Amendment filed on December 30, 2005, and entered into the record via a Request for Continued Examination (RCE) filed on January 26, 2006.

Additionally, Applicants note the §102(e) rejection of claims 6, 8, 50, 59 mistakenly indicate Kubo, in addition to Omura, as a basis for an anticipatory rejection. Applicants are operating under the reasonable assumption that the rejection using Kubo as a basis was withdrawn, and the claims 6, 8, 50, and 59 are being rejected under § 102 using solely Omura as a basis for the rejection in the outstanding Office Action.

If the Examiner fails to allow this instant application based upon the arguments presented herein, Applicants respectfully request that the Examiner provide another non-Final rejection to address these issues, so that Applicants have an adequate opportunity to respond to claims which were inadvertently overlooked (69 and 70) and claims rejected using a mistaken basis (6, 8, 50, 59).

Allowable Subject Matter

The Examiner indicated that claims 5, 10, 16, and 47 are directed to allowable subject matter, but are objected to as depending from rejected base claims. Applicants wish to thank the Examiner for the indication of allowable subject matter.

Claim Rejections - 35 U.S.C. § 102

The Examiner indicated claims 1-4, 6-9, 11-15, 17-24, 26, 28-39, 41-46 and 48-68 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Omura et al. (USP 6,421,042). Applicants submit the Examiner has failed to establish a *prima facie* case of anticipation and respectfully traverse this rejection.

Regarding independent claims 1, 11, 30, and 43, Omura merely discloses an input apparatus utilizing a lighting device for emitting light onto an entry area into which an arbitrary pointing body is inserted to perform a data entry operation. At least two image pickup devices are provided with a prespecified space therebetween on a peripheral section of the entry area, for picking up images of the pointing body illuminated by the light form the lighting device. Coordinates of position of the pointing body in the entry area are calculated from the images formed by the image pickup devices. (See Abstract.)

Specifically, Omura discloses a security function whereby authentication processing is performed using a software keyboard displayed on the image display unit 7502 (col. 57, lines 65-67), or may be performed using according to handwriting of a user's signature (col. 59, lines 26-28).

Regarding the embodiment concerned with the software keyboard, Omura discloses a touched area computing section which computes an area of the touched portion. When it is determined that the touched area exceeds a threshold value, the software keyboard is generated and displayed. (See col. 56, lines 1-22.)

Omura further discloses a code generating section 7811 which converts a coordinate signal of a touched position on the touch surface detected in the touched position detection section 7505 to a code signal according to a preset table. The touched area signal storing section 7812 successively stores, when a touched area computed in the touched area computing section 7504 is smaller than the threshold value, the computed touched areas therein. The code signal storing section 7813 successively stores code signals converted in the code generating section 7811. The reference signal storing section 7814 stores a series of code signals for the users previously authorized to used the display board system and also stores a series of touched areas each as reference signals. The comparing section 7810 executes authentication processing by comparing an input signal consisting of the touched area signal series stored in the touched area signal storing section 7812 and the code signal series stored in the code signal storing section 7813 with the references signals stored in the reference signal storing section 7814. (See col. 58, lines 13-31; Fig. 86.)

Omura further discloses a software keyboard on the image display unit 7502. The user touches the touch surface corresponding to the software keyboard to enter a PID number or password. The touched position detecting section 7505 detects coordinates of each touched position on the coordinate-position input device 7501 and sends the coordinates to the code generating section 7811. The code generating section converts the received coordinates into

code signals and successively stores the code signals in the code signal storing section 7813. (See col. 58, lines 33-49; Fig. 87.) Once input of the PID or password is finished, the comparing section 7810 reads out the code signal series stored in the code signal storing section 7813 and the touched area signal series stored in the touched area signal storing section 7812, and compares the input signals consisting of the read-out code signal series and the touched area signal series with the reference signals consisting of the code signal series of the users authorized to access the computer system and the touched area signal series each previously registered in the reference signal storing section 7814. (See col. 58, lines 55–65.)

As a result of the comparison, when the reference signal coincident with the input signal is registered in the reference signal storing section 7814, it is determined that the user has been registered, and permission for the user to access the system is sent to the computer 7509. (See col. 59, lines 5-10.)

However, Omura fails to disclose, at least, "checking if the pair of coordinates are within a coordinate area belonging to an authorized user," as recited in claim 1; "a checking device which determines whether the at least one pair of coordinates are associated with at least one coordinate area belonging to an authorized user," as recited in claim 11; "determine whether the at least one pair of coordinates are associated with the stored information for authorizing access to the access-protected unit," as recited in claim 30; and "checking if the pair of coordinates are within a coordinate area belonging to an authorized user," as recited in claim 43.

Omura is distinguished from the above quoted subject matter in that the touched area, and the areas used to delineate keys on the software keyboard, are merely used to provide a means for a user to input a PID and/or a password. These areas encode sequence of characters, which

are input through the software keyboard, and are associated with a specific user. In Omura's system, identical areas may be used to uniquely represent different users because the sequence of characters may be changed to create different passwords. However, Omura fails to disclose, at least, "a coordinate area belonging to an authorized user."

Accordingly, Applicants respectfully request the Examiner to withdraw the rejection of claims 1, 11, 30, and 43. Claims 2-4, 6-9, 53, 54, 69, and 70 depend from claim 1, and are allowable at least for the reasons provided above for allowable claim 1. Claims 12-15, 17-29, 55, 56, and 58 depend from claim 11, and are allowable at least for the reasons provided above for allowable claim 11. Claims 31-42 depend from claim 30, and are allowable at least for the reasons provided above for allowable claim 30. Claims 44-46, 48-52, and 57 depend from claim 43, and are allowable at least for the reasons provided above for allowable claim 43.

Regarding independent claims 59 and 65, Omura merely discloses determining position using image pickup devices 7L and 7R provided at both edges of the upper side of the entry area 2 on the same side as that of the lighting device 4 and are separated from each other by a distance L. The image pickup devices pick up an image of a pointing body inserted into the entry area 2. Each of the image pickup devices 7L and 7R have at least a 1-D or 2-D CCD 5 for outputting image information as an electric signal and focusing optical lens 6 for forming an image of the pointing body inserted into the entry area 2 on the CCD 5. (See col. 11, lines 8-20; Figs 4 and 5.) When the pointing body (e.g., a pen) is inserted into the entry area 2 to write a character or a graph at a certain position (x, y) on the writing surface E, the inserted pen A is illuminated by the light emitted from the lighting device 4. A subject image as an image of the portion of the illuminated pen A is formed on each of the CCDs 5 through the focusing optical lens 6 of the

image pickup devices 7L and 7R. The xy computing unit 23 shown in Fig. 3 executes the processing for computing coordinates (x, y) of a position of the pen A according to the subject images formed on the CCDs 5. (See col. 14, lines 51-61; Fig. 4.)

The coordinates (x, y) of the position of the pen can be computed based on triangulation using the two image pickup devices using standard trigonometric relations. (See col. 15, lines 57-63.) Because the values x and y coordinates depend upon the positions of the image pickup devices 7L and 7R, the x and y coordinate values are relative, not absolute, position values.

However, Omura fails to disclose, at least, "a position coding pattern associated with the writing field, wherein the position coding pattern encodes at least one pair of absolute coordinate positions used to grant access authorization," as recited in claim 59; and "providing a position coding pattern associated with a writing field coupled to a base, wherein the position coding pattern encodes at least one pair of absolute coordinate positions used to grant access authorization," as recited in claim 65.

Applicants submit that the portion of Omura cited by the Examiner in support of the rejection fails to anticipate the above quoted subject matter. In col. 58, lines 43-49, Omura merely discloses that coordinates correspond to keys of the software keyboard. The coordinates corresponding to each key are sent to the code generating section which converts the coordinates into code signals which are compared to references signals for user authentication. Omura fails to disclose, at least, a position coding pattern encoding absolute position coordinates. Accordingly, Applicants respectfully request the Examiner to withdraw the rejection of claims 59 and 65. Claims 60-64 depend from claim 59 and are allowable at least for the reasons

provided above for allowable 59. Claims 66-68 depend from claim 65 and are allowable at least for the reasons provided above for allowable 65.

Claim Rejections - 35 U.S.C. § 103

The Examiner rejected claims 25, 27 and 40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Omura et al. (USP 6,421,042). Applicants submit the Examiner as failed to establish a *prima facie* case of obviousness, and respectfully traverse this rejection.

Claims 25 and 27 depend from independent claim 11, and claim 40 depends from independent claim 30. Dependent claims 25, 27, and 40 include all of the features recited in there respective independent claims, and are allowable over Omura at least for the reasons provided above in the arguments for the allowability of independent claims 11 and 40. Accordingly, Applicants respectfully request the Examiner to withdraw the§ 103(a) rejection of claims 25, 27, and 40.

CONCLUSION

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Michael K. Mutter (Reg. No. 29,680) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), the Applicants respectfully petition for a one (1) month extension of time for filing a response in connection with the present application and the required fee of $120.00 is being filed concurrently herewith.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

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